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Attorneys for Plaintiff
Robyn Alise Cohen

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ROBYN ALISE COHEN,)	Case No.: 2:21-cv-00031-VCF
)	
Plaintiff,)	STIPULATION AND [PROPOSED]
)	ORDER FOR THE AWARD AND
vs.)	PAYMENT OF ATTORNEY FEES
)	PURSUANT TO THE EQUAL
KILOLO KIJAKAZI,)	ACCESS TO JUSTICE ACT, 28 U.S.C.
Acting Commissioner of Social)	§ 2412(d) AND NO COSTS
Security,)	PURSUANT TO 28 U.S.C. § 1920
)	
Defendant.)	

TO THE HONORABLE CAM FERENBACH, MAGISTRATE JUDGE OF
THE DISTRICT COURT:

IT IS HEREBY STIPULATED by and between the parties through their undersigned counsel, subject to the approval of the Court, that Robyn Alise Cohen be awarded attorney fees and expenses in the amount of three thousand nine hundred fifty-two dollars and eighty three cents (\$3,952.83) under the Equal Access to Justice Act (EAJA), 28 U.S.C. § 2412(d), and no costs under 28 U.S.C. § 1920. This amount represents compensation for all legal services rendered on behalf of Plaintiff by counsel in connection with this civil action, in accordance with 28 U.S.C. §§ 1920; 2412(d).

1 After the Court issues an order for EAJA fees to Robyn Alise Cohen, the
2 government will consider the matter of Robyn Alise Cohen's assignment of EAJA
3 fees to Cyrus Safa. The retainer agreement containing the assignment is attached
4 as exhibit 1. Pursuant to *Astrue v. Ratliff*, 130 S.Ct. 2521, 2529 (2010), the ability
5 to honor the assignment will depend on whether the fees are subject to any offset
6 allowed under the United States Department of the Treasury's Offset Program.
7 After the order for EAJA fees is entered, the government will determine whether
8 they are subject to any offset.

9 Fees shall be made payable to Robyn Alise Cohen, but if the Department of
10 the Treasury determines that Robyn Alise Cohen does not owe a federal debt, then
11 the government shall cause the payment of fees, expenses to be made directly to
12 Law Offices of Lawrence D. Rohlfsing, Inc., CPC, pursuant to the assignment
13 executed by Robyn Alise Cohen.¹ Any payments made shall be delivered to Cyrus
14 Safa.

15 This stipulation constitutes a compromise settlement of Robyn Alise
16 Cohen's request for EAJA attorney fees, and does not constitute an admission of
17 liability on the part of Defendant under the EAJA or otherwise. Payment of the
18 agreed amount shall constitute a complete release from, and bar to, any and all
19 claims that Robyn Alise Cohen and/or Cyrus Safa including Law Offices of
20 Lawrence D. Rohlfsing, Inc., CPC may have relating to EAJA attorney fees in
21 connection with this action.

22 This award is without prejudice to the rights of Cyrus Safa and/or the Law
23 Offices of Lawrence D. Rohlfsing, Inc., CPC to seek Social Security Act attorney
24

25 ¹ The parties do not stipulate whether counsel for the plaintiff has a cognizable lien
26 under federal law against the recovery of EAJA fees that survives the Treasury
Offset Program.

1 fees under 42 U.S.C. § 406(b), subject to the savings clause provisions of the
2 EAJA.

3 DATE: June 9, 2022

Respectfully submitted,

4 LAW OFFICES OF LAWRENCE D. ROHLFING, INC., CPC

5 /s/ *Cyrus Safa*

6 BY:

Cyrus Safa

Attorney for plaintiff Robyn Alise Cohen

8
9 DATE: June 9, 2022

JASON M. FRIERSON
United States Attorney

11 /s/ *Allison J. Cheung*

12 ALLISON J. CHEUNG

13 Special Assistant United States Attorney
14 Attorneys for Defendant KILOLO KIJAKAZI,
Acting Commissioner of Social Security
15 (Per e-mail authorization)

16 IT IS SO ORDERED

17
18 DATE:

19 6-10-2022

20 
THE HONORABLE CAM FERENBACH
UNITED STATES MAGISTRATE JUDGE